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12 Attorneys for Debtors-In-Possession,
13 FRE 355 INVESTMENT GROUP, LLC and
14 MORA HOUSE, LLC

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA - DIVISION 5

12 In re:	Case No. 20-50628-SLJ
13 FRE 355 INVESTMENT GROUP, LLC, dba	Cases Jointly Administered
14 FRE 355,	Chapter 11
15 Debtor.	
16 In re	Case No. 20-50631-SLJ
17 MORA HOUSE, LLC,	Chapter 11
18 Debtor.	Date: September 3, 2020
19	Time: 1:30 p.m.
20	Courtroom: 9
	Tele/Video

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SECOND JOINT CHAPTER 11 STATUS CONFERENCE STATEMENT

Comes now Debtors FRE 355 Investment Group, LLC ("FRE 355") and Mora House, LLC ("Mora" together with FRE 355 the "Debtors") and respectfully represent:

1. The Debtors incorporate by reference the history of events leading up to the bankruptcy filing as reflected in the initial chapter 11 status conference statement filed in these cases at docket #50.

1 2. The Debtors filed a joint chapter 11 plan and a disclosure statement on July 10,
2 2020 (docket #64 and 65 respectively). The plan and disclosure statement were filed within the
3 90-day period for these single asset real estate cases pursuant to 11 U.S.C. §362(d)(3) and within
4 the exclusive time for the Debtors to file a plan of August 11, 2020. Accordingly, the exclusive
5 time for the Debtors to solicit acceptances is October 10, 2020. The hearing to approve the
6 disclosure statement is scheduled for the same time as this continued status conference.

7 3. The U.S. Trustee filed an objection to the disclosure statement about which the
8 parties met and conferred, in part. The Debtors will, through counsel, communicate further and
9 attempt to generate an agreed amendment to satisfy the concerns raised.

10 4. There is pending before the Court the (a) motion for relief from stay and (b) a
11 related motion to dismiss the bankruptcy, both filed by secured creditor Platinum Loan Servicing
12 (“Platinum”). The Court has set a final hearing on both matters together for September 29, 2020
13 and issued a schedule for the Debtor to file opposition to the motion for relief from stay and for a
14 reply. The Debtor previously filed opposition to the motion to dismiss on August 5, 2020 (docket
15 #79, 79-1 and 79-2). The Debtors anticipate filing an objection to the claim of Platinum within the
16 next few days and will seek informal discovery regarding the claim as well as Platinum’s two
17 pending motions.

18 5. The Debtors have provided proof of insurance coverage on both properties to the
19 United States Trustee as well as to counsel for Platinum. Both properties are insured under a
20 policy with State Farm.

21 6. The Debtors are current in the filing of monthly operating reports and payment of
22 quarterly fees to the U.S. Trustee.

23 Dated: August 27, 2020

BINDER & MALTER, LLP

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25 By: /s/ Robert G. Harris
26 Robert G. Harris
27 Attorneys for Debtors
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